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October 26, 2018

VIA ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Raniere, et al.*, 18-cr-204 (NGG)(VMS)

Dear Judge Scanlon:

We write jointly on behalf of Defendants Bronfman, Raniere and Nancy Salzman, and the Government, in response to the Court's direction to file a joint letter setting forth a briefing schedule for privilege motions by today (ECF No. 162).

Each of the affected Defendants have conferred with the Government's privilege review attorney regarding the Government's privilege review. On October 22, the Government requested additional information from Defendants to clarify the nature and scope of the privileges being asserted by each Defendant. Defendants are working to respond to the Government's request and will respond next week. The parties jointly propose that we continue working to narrow the areas of potential dispute and that we will update the Court as to the status of our discussions by next Friday, November 2, 2018.

Respectfully submitted,

/s/

Kathleen E. Cassidy

cc: AUSAs Moira Kim Penza, Tanya Hajjar (via ECF)
All defense counsel (via ECF)